

Exhibit 5

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JAMAAL CAMERON; RICHARD BRIGGS;
RAJ LEE; MICHAEL CAMERON; MATTHEW
SAUNDERS, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

MICHAEL BOUCHARD, in his official capacity
as Sheriff of Oakland County; CURTIS D.
CHILDS, in his official capacity as Commander of
Corrective Services; OAKLAND COUNTY,
MICHIGAN,

Defendants.

Case No. 20-cv-10949

DECLARATION OF DENNIS CARTER

I, Dennis Carter, declare:

I make this declaration based upon my own personal knowledge, and if called to testify, I could and would do so competently.

1. I am currently detained in the Oakland County Jail and have been detained here since July 2018.
2. I am currently housed in a single cell in the D-pod. There are other people housed in the other D-pod cells and we have shared spaced in the pod's common area that we are able to access during the periods of time when we are outside our cells. That space has a phone and shower that we all share. We have no way to clean the phone and shower ourselves, so we count on trustees to do that. Sometimes they clean the shower and sometimes they

don't. The phone is not cleaned between each use and is filthy. I put a sock over the phone to speak with people when making calls.

3. Around November 6, a guy named Montreale in cell B3 in my pod was coughing and wheezing and sounding really sick, and he was tested for coronavirus. However, he was not moved out of his cell at that time.
4. Two or three days later, they came back and moved Montreale. The deputies told us that he had tested positive for coronavirus and that our pod was now on quarantine.
5. There are eight other people in this pod right now and no way to adequately social distance.
6. Our pod is disgusting. For several weeks, including when Montreale was sick, whenever the guy in cell B-4 would flush his toilet, the toilet in the adjoining cell overflows and toilet water and sewage flow down the hallway. We have no way to clean this up and I worry that it runs the risk of spreading the virus throughout our pod. They just fixed this yesterday after about a month of this going on.
7. I get two or three small bars of soap once a week. It's often not enough to get through the week. The only way to ask for more is to bang on the bars and beg. But the guards don't like it when I do that and have refused to bring me more soap.
8. Some of the guards and nurses in here wear masks and some don't. For example, today I saw about four or five deputies and only one was wearing a mask. Two nurses came by earlier today passing out medicine. One was wearing a mask, one wasn't. When the nurses hand me my medicines, they are directly in front of me with only the bars separating us. When lieutenants and deputies do their rounds, they often are not wearing masks. When they come by our cell to check on me, they are about three or four feet away. The same deputies and nurses are responsible for checking on other inmates in my pod and elsewhere.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

November 18, 2020

/s/Dennis Carter
Dennis Carter

*consent for signing given telephonically

Due to the COVID-19 crisis, it was not possible to obtain a written signature on the above declaration. I am an attorney admitted to the Eastern District of Michigan. On November 18, 2020, I personally spoke with Dennis Carter and read this declaration to him. Mr. Carter told me that the information in the above declaration is true, and gave me verbal consent to sign on his behalf.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

/s/Philip Mayor
Philip Mayor